



**Service of Process
Transmittal**

10/08/2021

CT Log Number 540383164

TO: Kim Lundy- Email
Walmart Inc.
702 SW 8TH ST
BENTONVILLE, AR 72716-6209

RE: Process Served in Ohio

FOR: WALMART INC. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: COMBS PATTI // To: WALMART INC.

DOCUMENT(S) SERVED: Summons, Complaint with Demand

COURT/AGENCY: Warren County Court of Common Pleas, OH
Case # 21CV094585

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 10/03/2019, Walmart Super Center store No. 1441 located at 5303 Bowen Dr., Mason, OH, 45040

ON WHOM PROCESS WAS SERVED: C T Corporation System, Columbus, OH

DATE AND HOUR OF SERVICE: By Certified Mail on 10/08/2021 postmarked on 10/04/2021

JURISDICTION SERVED : Ohio

APPEARANCE OR ANSWER DUE: Within 28 days after service, excluding the date of service

ATTORNEY(S) / SENDER(S): Kimberly L. Beck
Beck Law Center
201 E. 5th Street, Suite 1900
Cincinnati, OH 45202
888-434-2912

ACTION ITEMS: CT has retained the current log, Retain Date: 10/08/2021, Expected Purge Date: 10/13/2021

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
4400 Easton Commons Way
Suite 125
Columbus, OH 43219
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

JAMES L. SPAETH
CLERK OF COURTS, WARREN COUNTY
P.O. BOX 238, LEBANON, OHIO 45036



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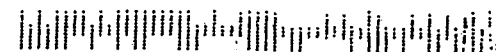


U.S. POSTAGE >> PITNEY BOWES
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RETURN RECEIPT REQUESTED

21CV094585
CT CORPORATION SYSTEM
KAITY TOON
4400 ESTON COMMONS WAY SUITE 125
COLUMBUS, OH 43219

10/1/21



SUMMONS

**WARREN COUNTY COURT OF COMMON PLEAS
500 JUSTICE DRIVE - P.O. BOX 238
LEBANON, OHIO 45036**

CASE # 21CV094585

PATTI COMBS

VS

WALMART INC, ET. AL.

TO THE FOLLOWING NAMED PARTY:

CT CORPORATION SYSTEM
KAITY TOON
4400 ESTON COMMONS WAY SUITE 125
COLUMBUS, OH 43219

You have been named in a complaint filed in this court by the following party:

PATTI COMBS

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.

Failure to appear and present a defense to this complaint will result in a judgment by default being rendered against you for the relief demanded in the complaint.

The address of his/her attorney is:

KIMBERLY L. BECK, ATTORNEY AT LAW
201 E 5TH STREET
SUITE 1900
CINCINNATI, OH 45202

James L. Spaeth, Clerk of Courts
500 Justice Drive - P.O. Box 238
Lebanon, Ohio 45036

By: 

ELIZABETH LEISZ, DEPUTY CLERK
October 01, 2021

IF THE ABOVE NAMED DEFENDANT IS A CORPORATION PLEASE REFER TO OHIO REVISED
CODE 4705.01.

**WARREN COUNTY COURT OF COMMON PLEAS
WARREN COUNTY, OHIO**

COMMON PLEAS COURT
WARREN COUNTY, OHIO
FILED

2021 OCT -1 AM 9:35

<p>Patti Combs, 8701 Brittnie Dr. Blue Ash, OH 45242 Plaintiff,</p> <p>v.</p> <p>Walmart, Inc., 702 SW 8th St. Brentville, AR 72712 c/o</p> <p>CT Corporation System – Kaity Toon 4400 Eston Commons Way, Suite 125 Columbus, OH 43219</p> <p>Defendant.</p>	<p>Case No: 21CV94585</p> <p>Judge: JUDGE ODA</p> <p>COMPLAINT WITH JURY DEMAND</p> <p align="right">JAMES L. SPAETH CLERK OF COURTS</p>
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Plaintiff Patti Combs ("Plaintiff") brings the following cause of action against Walmart, Inc. (Defendant) and states as follows:

1. Defendant owns the Walmart Super Center located at 5303 Bowen Dr., Mason, OH 45040 ("Walmart Super Center").
2. Upon information and belief, Defendant identifies that Walmart Super Center as store 1441.
3. The floor of the Walmart Super Center had become damaged prior to October 3, 2019.
4. Specifically, a section of the grout between two large tiles was broken and missing.
5. The missing section of grout created a whole in the floor of the Walmart Super Center near the pharmacy, approximately 1/4 to 1/2 inch wide, by seven or eight inches long, by 1/4 to 1/2 inch deep ("broken floor").

6. Defendant knew or should have known of the broken floor, as it had clearly been broken for some time, such that the broken grout had been removed from the area.
7. On or about October 3, 2019, Plaintiff entered the Walmart Super Center for the purpose of purchasing goods.
8. Plaintiff was an invitee of the Walmart Super Center.
9. While shopping at the Walmart Super Center, Plaintiff's foot became caught on the broken floor causing Plaintiff to fall to the ground.
10. Plaintiff's arm was broken when she hit the ground.
11. Plaintiff required two surgeries on the arm, including the installation of several orthopedic devices such as screws and plates.
12. Plaintiff was unable to work for approximately nine months as a result of her injuries.

First Cause of Action
Negligence

13. Plaintiff incorporates all allegations in the previous paragraphs as if fully restated herein.
14. Defendant owed Plaintiff a duty to keep areas in the store that are open to the public in a reasonably safe condition.
15. Defendant breached the duty owed to Plaintiff by failing to repair or warn of the broken floor.
16. As a result of the negligence of the Defendant, Plaintiff suffered permanent bodily injury, and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization,

medical and nursing care, treatment, and loss of earnings of loss of ability to earn money. As the injuries are permanent, Plaintiff will continue to suffer losses in the future.

PRAYER

WHEREFORE, Plaintiff seeks compensatory damages in the amount of \$250,000, plus costs and attorney's fees incurred by Plaintiff in connection with this action.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DATE: October 1, 2021

Respectfully submitted,

s/ Kimberly Beck
Kimberly L. Beck, #80616
BECK LAW CENTER
201 E. 5th Street, Suite 1900
Cincinnati, OH 45202
Phone: 888-434-2912
513-509-5683
Email: kim@becklawcenter.com